

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

**THE DELOACH GROUP, INC. d/b/a,
Quastar Computer International,**

Plaintiff,

vs.

**ASHFORD FINANCE, LLC; NOUSHIR
HASAN; CARREFOUR INFORMATIQUE
TREMBLANT, INC.; CORPORATE
FUNDING PARTNERS, LLC; GANGES
EXPORTS USA; MIKE TONES; AMIN
HAQ; BEEM KHEMANEY**

Defendants.

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**CASE NO.:
1-:11-CV-1678-LMM**

**DEFENDANTS CORPORATE FUNDING PARTNERS, LLC,
LC.COM, LTD., AND MARSHALL JABLON'S NOTICE OF
DEPOSITION OF THE DELOACH GROUP, INC. d/b/a/ QUASTAR
COMPUTER INTERNATIONAL PURSUANT TO FRCP 30(B)(6)**

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendants Corporate Funding Partners, LLC, LC.COM, Ltd., and Marshall Jablon (CFP Defendants) hereby notice the deposition of Plaintiff, The Deloach Group, Inc. d/b/a/, Quastar Computer International, which shall be taken by oral examination before a stenographer certified in the state of Georgia. This is a demand that Plaintiff

comply with its duty to designate and produce the person(s) with the most knowledge with respect to each of the areas of inquiry set forth by Defendants Nosh Hasan and Ashford Finance's Notice of Deposition and those set forth in CFP Defendant's Attachment A, who can provide binding testimony pursuant to Federal Rule of Civil Procedure 30(b)(6).

The deposition(s) shall take place on Friday February 27, 2015 at 10:00 a.m. at Plaintiff's counsel's office located at 2 Ravinia Drive, Suite 650, Atlanta, Georgia 30346.

Respectfully submitted this 26th day of January, 2015.

HIRSH & HEUSER, P.C.

s/Michael R. Hirsh

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*Special Appearance Counsel for
Corporate Funding Partners, LLC*

LIONEL J. POSTIC, P.C.

s/Lionel J. Postic

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*Special Appearance Counsel for
Corporate Funding Partners, LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th Day of January, 2015, I electronically filed the foregoing Notice of Deposition of Plaintiff pursuant to FRCP 30(b)(6) with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record by transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/Michael R. Hirsh
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Kennesaw, GA 30144
404-713-4400
mrhirsh@hirshandheuser.com

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LLC; GANGES EXPORTS USA; MIKE
TONES; AMIN HAQ; BEEM
KHEMANEY,**

Defendants.

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1

The undersigned hereby certifies that the foregoing Notice of Deposition has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

/s/ Michael R. Hirsh
Michael R. Hirsh

Attachment A

Subject to and in addition to the DEFINITIONS, INSTRUCTIONS, and Matters of Inquiry as were set forth in the Attachment to Defendant Hasan and Defendant Ashford Finance's Notice of Deposition, the person, persons, or knowledgeable representative(s) so designated shall testify pursuant to Fed.R.Civ.P. 30(b)(6) about matters known or reasonably available to Deloach concerning these specific areas of inquiry:

1. All matters pertaining to Deloach's Responses to the CFP Defendants' First Set of Interrogatories.
2. All matters pertaining to Deloach's Responses to the CFP Defendants' First Set of Document Requests.
3. Identify which Documents produced in this litigation that pertain to the assertion that Ganges Export is the alter ego of one or all of the CFP Defendants.
4. Identify which Documents produced in this litigation that pertain to the assertion that Carrefour is the alter ego of one or all of the CFP Defendants.
5. Identify which Documents produced in this litigation which pertain to

the assertion that a conspiracy exists or existed between any or all of the CFP Defendants and any other person or entity in the Letter of Credit that is the subject of this lawsuit.

6. Identify which Documents produced in this litigation which pertain to any or all of the CFP Defendants having any participation in the Letter of Credit that is the subject of this lawsuit.
7. Provide testimony of the basis for Plaintiff's assertion that Simon Asseraf had authority to bind any of the CFP Defendants.